

In the Matter of)	
)	
Revision of the Commission's Rules to)	CC Docket No. 94-102
Ensure Compatibility with Enhanced 911)	
Emergency Calling Systems)	

AIRTEL WIRELESS LLC AMENDMENT TO
PETITION FOR WAIVER OF SECTION 20.18(g) OF THE RULES

Discussion

After filing its Petition for Waiver, Petitioner recognized that it needed to clarify the relationship between its Harmony™ system and Motorola's proprietary iDEN technology. The Harmony™ system is a *derivative* of iDEN, not simply a smaller-market iDEN product, and differs from it in certain respects. Because the standard iDEN system is designed to serve subscribers units in the hundreds of thousands or millions over broad coverage areas, it uses many platforms that are focused on performing a few tasks at very high volumes. The Harmony™ system, in contrast, is designed to serve smaller networks and has substantially fewer platforms that perform more tasks

at much lower volume. As a result, each system utilizes a different mobile switching office (“MSO”) technology.

Although the MSO switching component differs from that used in iDEN networks, the Harmony™ system makes use of the same cell site infrastructure and subscriber handset units. Accordingly, Petitioner’s proposed handset deployment schedule remains unchanged.

Because of the differences in switching technology, however, Petitioner must amend its proposed schedule to accommodate the deployment of the network component of its Phase II solution. The Phase II solutions developed for Nextel and SoutherLINC incorporate a network component that is incompatible with the Harmony™ switching platform. Because Harmony™ has had very limited deployment in the United States and does not enjoy iDEN’s overall subscriber base, no network component has been developed to complement the planned handset deployment for Petitioner’s Harmony™ system.

As a result, Petitioner will need to select an appropriate E911 network component. As explained in a recent letter from Motorola (a copy of which will be submitted under separate cover), Motorola has begun preparing an interface specification that will describe how the GPS information collected from the handsets will be provided to third-party providers of location service processing elements. Once this standard is published, Motorola will use it to solicit proposals from various vendors for the installation of cost-effective E911 Phase II switching solutions. Clearly, this will take time. Even for nationwide carriers, the process of soliciting, evaluating, and selecting among proposals for technology upgrades can take several months, even years. As a smaller carrier just now commencing service, Petitioner lacks the size and financial leverage to

negotiate accelerated deployment dates.^{1/} Therefore, Petitioner proposes to install the switching components for its E911 solution upgraded switches with Phase II capability no later than July 31, 2003. Petitioner further proposes to begin providing Phase II location data to public safety answering points within six months of a valid Phase II request or by December 31, 2003, whichever is later.

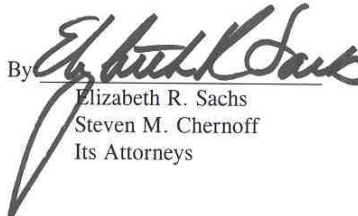
Conclusion

Petitioner hereby amends its Petition for Waiver of the Phase II E911 rules to add a commitment to ensure the installation of Phase II switch equipment by July 31, 2003, and to begin providing Phase II location data within six months of a valid Phase II request or by December 31, 2003, whichever is later.

Respectfully submitted,

AIRTEL WIRELESS LLC

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^{1/} See Inland Cellular Telephone Co. Petition for Limited Waiver of Sections 20.18(e) and (g) of the Rules at 3 (July 30, 2001) ("Smaller carriers in smaller markets are at the 'end of the line' for product distribution. It is accepted industry practice that [General Availability] dates are availability dates for large market carriers only and that smaller carriers can expect significant delays.")